

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re Innocoll Holdings Public Limited Company
Securities Litigation

C.A. No. 2:17-cv-00341-GEKP

CLASS ACTION

CLASS ACTION

This Document Relates To:
All Actions

**LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND PLAN OF ALLOCATION**

Pursuant to the Order Granting Lead Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement ("Preliminary Approval Order") (Dkt. No. 128), on July 6, 2022 at 2:00 p.m., before the Honorable Gene E.K. Pratter of the United States District Judge of the United States District Court for the Eastern District of Pennsylvania, 601 Market Street, Courtroom 10-B, Philadelphia, PA 19106, Lead Plaintiffs Russel Bleiler and Carl Bayney ("Lead Plaintiffs"), will respectfully move this Court for an Order: (1) granting final approval of the Settlement in the Action on the terms in the Stipulation; and (2) approving the Plan of Allocation for the distribution of the Net Settlement Fund.¹

This motion is based on this Notice of Motion; the Memorandum of Law in Support thereof; the Declaration of Jonathan Horne in Support of the Motions for: (I) Final Approval of

¹ Capitalized terms that are not otherwise defined herein have the same meanings given to them in the Stipulation of Settlement filed November 24, 2021 (Dkt. No. 121-2).

Class Action Settlement and Plan of Allocation; and (II) an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Compensatory Awards to Lead Plaintiffs; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

A proposed Order and Final Judgment granting the requested relief will be submitted with Lead Plaintiffs' reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

Dated: June 1, 2022

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

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*Lead Counsel for Lead Plaintiffs and the
Proposed Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that on this on June 1, 2022, a true and correct copy of the foregoing document was served by CM/ECF to the Parties registered to the Court's CM/ECF system.

/s/ Jacob A. Goldberg
Jacob A. Goldberg